

Exhibit 2

From: Herring, Angela K. <AKHerring@wlrk.com>
Sent: Friday, August 2, 2019 7:01 AM
To: Bassett, Nicholas A. (Paul Hastings LLP); Pavel, Ashley; Clark, Brandon C.
Cc: Brian.Liegel@weil.com; Debora.Hoehne@weil.com; gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP); Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil, Gotshal & Manges LLP); Moshe.Fink@weil.com; National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP); Bongartz, G. Alexander (Paul Hastings LLP); Tenzer, Andrew V. (Paul Hastings LLP); Bliss, James R. (Paul Hastings LLP); Worthington, James B. (Paul Hastings LLP); lucdespins@paulhastings.com; Comerford, Michael (Paul Hastings LLP); Jimenez, Pedro; Zwillinger, Zachary S.; Wolf, Amy R.; Kleinhaus, Emil A.; Celentino, Joseph C.; Lynch, John F.; Mason, Richard G.; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP); sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP); Baker, Nicolas (Simpson Thacher & Bartlett LLP); Qusba, Sandeep (Simpson Thacher & Bartlett LLP); notificaciones@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; lft@tcm.law; mfb@tcm.law; nperez@tcm.law; ebarak@proskauer.com; Carino, Elisa M.; Mashberg, Gregg M. (Proskauer Rose LLP); Jones, Jennifer L.; Geary, Laura M.; Stafford, Laura (Proskauer Rose LLP); Wolf, Lucy C.; mbienenstock@proskauer.com; Dale, Margaret A. (Proskauer Rose LLP); Mervis, Michael T. (Proskauer Rose LLP); Possinger, Paul V. (Proskauer Rose LLP); Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP); Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP); Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP); thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP); Caton, Amy (Kramer Levin Naftalis & Frankel LLP); Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP); Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP); McKeen, Elizabeth L.; Mitchell, Nancy; Friedman, Peter; Yang, Roger; Roth, Joseph L.
Subject: RE: PREPA - 9019 Motion - AAFAP and PREPAs Responses and Objections to Discovery

Liz and Margaret –

Following up on our call yesterday, we do intend to file our motion today. Please let me know if the below proposed briefing schedule works or if you have an alternate proposal.

Thanks,
Angie

From: Herring, Angela K.
Sent: Thursday, August 1, 2019 3:27 PM
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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

All:

Per my note last night, we plan to file a motion to compel with respect to our July 15 discovery requests tomorrow (Friday, August 2). Given the current discovery schedule, we will also seek an expedited briefing schedule – we propose a response deadline of Wednesday, August 7 and a reply deadline of Friday, August 9. Based on the Court's July 12 Order stating that it will take post-July 16 motions on submission, we are not proposing a hearing date. Please let us know if the Government Parties intend to object to this scheduling request.

Thanks,
Angie

Angela K. Herring

Wachtell, Lipton, Rosen & Katz

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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley,

Do you have any update on your diligence concerning the existence of documents relating to the Rate Motion? Given the tight timing, we intend to move to compel production of documents and testimony this week, though we remain willing to meet and confer further.

Regards,

Angie

Angela K. Herring

Wachtell, Lipton, Rosen & Katz

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Sent: Thursday, July 25, 2019 5:32 PM

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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

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The Committee reserves the same rights. Thank you.



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Subject: [EXT] RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley,

Thank you for the update. Particularly in light of this delay, we reserve all rights to seek relief from the discovery schedule based on the timing of any production in response to these requests (as a result of court order or otherwise).

Regards,
Angie

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Sent: Wednesday, July 24, 2019 6:09 PM

To: Herring, Angela K. <AKHerring@wlrk.com>; Clark, Brandon C. <BClark@proskauer.com>; Bassett, Nicholas A. (Paul Hastings LLP) <nicholasbassett@paulhastings.com>

Cc: Brian.Liegel@weil.com; [Deborah.Hoehne@weil.com](mailto:Deбора.Hoehne@weil.com); gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP) <jonathan.polkes@weil.com>; Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil, Gotshal & Manges LLP) <marcia.goldstein@weil.com>; Moshe.Fink@weil.com; National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP) <mcto@debevoise.com>; Bongartz, G. Alexander (Paul Hastings LLP) <alexbongartz@paulhastings.com>; Tenzer, Andrew V. (Paul Hastings LLP) <andrewtenzer@paulhastings.com>; Bliss, James R. (Paul Hastings LLP) <jamesbliss@paulhastings.com>; Worthington, James B. (Paul Hastings LLP) <jamesworthington@paulhastings.com>; Despina, Luc A. (Paul Hastings LLP) <lucdespins@paulhastings.com>; Comerford, Michael (Paul Hastings LLP) <michaelcomerford@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Zwilling, Zachary S. <zacharyzwilling@paulhastings.com>; Wolf, Amy R. <ARWolf@WLRK.com>; Kleinhaus, Emil A. <EAKleinhaus@WLRK.com>; Celentino, Joseph C. <JCCelentino@wlrk.com>; Lynch, John F. <JLynch@wlrk.com>; Mason, Richard G. <RGMason@WLRK.com>; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP) <jamie.fell@stblaw.com>; sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) <bfriedman@stblaw.com>; Baker, Nicolas (Simpson Thacher & Bartlett LLP) <nbaker@stblaw.com>; Qusba, Sandeep (Simpson Thacher & Bartlett LLP) <squsba@stblaw.com>; notificaciones@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; lft@tcm.law; mfb@tcm.law; nperez@tcm.law; Barak, Ehud (Proskauer Rose LLP) <ebarak@proskauer.com>; Carino, Elisa M. <ecarino@proskauer.com>; Mashberg, Gregg M. (Proskauer Rose LLP) <gmashberg@proskauer.com>; Jones, Jennifer L. <jljones@proskauer.com>; Geary, Laura M. <LGeary@proskauer.com>; Stafford, Laura (Proskauer Rose LLP) <lstafford@proskauer.com>; Wolf, Lucy C. <lwolf@proskauer.com>; Bienenstock, Martin J. (Proskauer Rose LLP) <mbienenstock@proskauer.com>; Dale, Margaret A. (Proskauer Rose LLP) <mdale@proskauer.com>; Mervis, Michael T. (Proskauer Rose LLP) <mmervis@proskauer.com>; Possinger, Paul V. (Proskauer Rose LLP) <ppossinger@proskauer.com>; Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP) <ellen.halstead@cwt.com>; Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP) <howard.hawkins@cwt.com>; Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP) <mark.ellenberg@cwt.com>; thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP) <abyowitz@kramerlevin.com>; Caton, Amy (Kramer Levin Naftalis & Frankel LLP) <acaton@kramerlevin.com>; Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP) <ghorowitz@kramerlevin.com>; Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP) <tmayer@kramerlevin.com>; McKeen, Elizabeth L. <emckeen@omm.com>; Mitchell, Nancy A. (O'Melveny & Myers LLP) <nmitchell@omm.com>; Friedman, Peter M. (O'Melveny & Myers LLP) <pfriedman@omm.com>; Yang, Roger <ryang@omm.com>; Roth, Joseph L. <joeroth@omm.com>

Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

*** EXTERNAL EMAIL ***

Angela-

The relevant PREPA personnel are currently out of the office. We are hoping to have an update for you early next week.

Best,
Ashley

O'Melveny

Ashley Pavel

apavel@omm.com

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From: Herring, Angela K. <AKHerring@wlrk.com>

Sent: Wednesday, July 24, 2019 12:55 PM

To: Clark, Brandon C. <BClark@proskauer.com>; Bassett, Nicholas A. (Paul Hastings LLP)
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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley and Brandon,

Following up on our call on Monday, I'm writing to see if you have any update on the diligence we discussed concerning the existence of communications with PREB, among any of the RSA parties, or within PREPA relating to the Rate Motion.

Regards,
Angie

Angela K. Herring

Wachtell, Lipton, Rosen & Katz

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Sent: Monday, July 22, 2019 7:56 AM

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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Brandon,

The issue we wish to discuss is the Government Parties' refusal to provide any discovery on the rate motion, which seeks to offset the RSA's Settlement Charge by reducing base rates. We believe the discovery we've requested is relevant to the 9019 motion, and your objection as to timeliness is misplaced in light of the failure of the Government Parties to let our clients know about the rate motion before the deadline you're seeking to invoke. We look forward to discussing these issues at 5:00 pm.

Regards,
Angie

Angela K. Herring

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From: Clark, Brandon C. <BClark@proskauer.com>

Sent: Sunday, July 21, 2019 12:18 AM

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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

*** EXTERNAL EMAIL ***

Angela & Nick ~

In order for us to most effectively use our time during the meet-and-confer that has been scheduled for Monday afternoon, we ask that you provide us advance notice of the issues you wish to discuss relating to the Government Parties' responses to discovery requests.

Thanks,
Brandon

Brandon C. Clark

Associate

[Proskauer](#)

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From: Pavel, Ashley <apavel@omm.com>

Sent: Saturday, July 20, 2019 1:17 PM

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Subject: Re: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Angela and Nick- O'Melveny and Proskauer can talk at 5 on Monday. If that works for the Fuel Line Lenders and the Committee, please circulate a calendar invitation.

On Jul 20, 2019, at 8:56 AM, Bassett, Nicholas <nicholasbassett@paulhastings.com> wrote:

The Committee requests to participate in the meet and confer as well.

Nick Bassett

Of Counsel

Paul Hastings LLP

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On Jul 20, 2019, at 11:53 AM, Herring, Angela K. <AKHerring@wlrk.com<<mailto:AKHerring@wlrk.com>>>> wrote:

Counsel:

Please let us know your availability on Monday afternoon or Tuesday to meet and confer concerning the Government Parties' responses and objections served last night. We'd like to discuss as soon as possible, as we will move to compel absent a resolution.

Regards,

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Subject: RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

*** EXTERNAL EMAIL ***

Counsel-

Please see the attaches responses and objections to the discovery requests served on AAFAF and PREPA by the
Fuel Line Lenders on July 15, 2019 and the UCC on July 16, 2019.

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